

No. 03-20-00129-CV

**IN THE THIRD COURT OF APPEALS
AUSTIN, TEXAS**

FILED IN
3rd COURT OF APPEALS
AUSTIN, TEXAS
9/11/2020 2:30:44 PM
JEFFREY D. KYLE
Clerk

**QATAR FOUNDATION FOR EDUCATION, SCIENCE AND
COMMUNITY DEVELOPMENT,
*Appellant,***

v.

**KEN PAXTON, TEXAS ATTORNEY GENERAL AND
ZACHOR LEGAL INSTITUTE,
*Appellees.***

Original Proceeding from the 200th Judicial District Court
of Travis County, Texas, Cause No. D-1-GN-18-006240

**UNOPPOSED FIRST MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF OF APPELLANT**

Appellant Qatar Foundation for Education, Science and Community Development respectfully files this Unopposed First Motion for Extension of Time to File Reply Brief of Appellant. The current deadline for filing the brief is **September 21, 2020**. Appellant requests a **30-day extension** of time for a new deadline of **October 21, 2020**.

The demands of other litigation have necessitated this request. These include:

1. Preparation of a Reply Brief of Appellants in *TJFA, L.P., et al. v. Texas Commission on Environmental Quality and 130 Environmental Park, LLC*, No. 03-19-00815-CV, in the Third Court of Appeals, filed September 9, 2020;
2. Preparation of a Motion for Rehearing in *VIA Metropolitan Transit v. Meck*, No. 18-0458, in the Supreme Court of Texas, due September 11, 2020;
3. Preparation of a Brief of Appellee in *MP Gulf of Mexico, LLC v. Total E&P USA, Inc.*, No. 12-20-00180-CV, in the Twelfth Court of Appeals, due September 14, 2020;
4. Preparation for and presentation of consolidated Oral Argument in *Electric Reliability Council of Texas, Inc. v. Panda Power Generation Infrastructure Fund, LLC d/b/a Panda Power Funds, et al.*, No. 18-0781 and *In re Panda Power Infrastructure Fund, LLC d/b/a Panda Power Funds, et al.*, No. 18-0792, in the Supreme Court of Texas, set September 15, 2020;
5. Preparation of Reply in Support of Petition for Review in *Allstate Fire and Cas. Ins. Co. and Allstate Ins. Co. v. Jesus Inclan*, in the Supreme Court of Texas, due September 17, 2020; and
6. Preparation of Reply in Support of Petition for Review in *Eureka Holdings Acquisitions, L.P. v. Marshall Apartments, LLC*, No. 20-0187, in the Supreme Court of Texas, due September 21, 2020.

Additionally, taking into account the COVID-19 outbreak and the attendant need for working remotely and under certain logistical challenges, Appellant anticipates that it will need 30 additional days to file its reply brief.

This extension is not sought for the purposes of delay, and no party will be prejudiced if it is granted. No prior extension has been granted for this deadline.

As set forth in the Certificate of Conference below, this motion for extension of time is unopposed.

For these reasons, Appellant requests that this Unopposed First Motion for Extension of Time be granted and Appellant's deadline to file its reply brief be extended 30 days to October 21, 2020.

Respectfully submitted,

/s/ Wallace B. Jefferson

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CERTIFICATE OF CONFERENCE

I certify that on September 11, 2020, I conferred with Kimberly Fuchs, counsel for Appellee Ken Paxton, Texas Attorney General, and Jennifer Riggs, counsel for Appellee Zachor Legal Institute, and they each stated that their clients do not oppose the relief sought in this motion for extension of time.

/s/ Anna M. Baker
Anna M. Baker

CERTIFICATE OF SERVICE

I hereby certify that on September 11, 2020, a true and correct copy of this motion, including any and all attachments, is served via electronic service through eFile.TXCourts.gov on parties through counsel of record, listed below:

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